

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

The STATE of TEXAS, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN JR., in his official capacity
as President of the United States, *et al.*,

Defendants.

Civil Action No. 3:22-cv-00780-M

JOINT ADVISORY
REGARDING THE PARTIES' RESOLUTION OF THE MATTER OF
JURISDICTIONAL DISCOVERY

In response to all parties' Joint Motion for an Extension of Current Deadlines and Entry of a Joint Briefing Schedule, ECF 47, the Court entered an Order that any party "wishing to obtain a Court order providing for [jurisdictional discovery] shall file [a motion] by August 19, 2022." ECF 48. The Order noted that such motions would only be necessary "[t]o the extent that the parties do not privately resolve the matter of jurisdictional discovery." *Id.*

The parties respectfully inform the Court that they will not be moving for jurisdictional discovery at this time. The parties have agreed to an initial framework for reciprocal jurisdictional discovery and are working within that framework in good faith to agree on specifics,¹ and do not anticipate needing the Court's intervention on this matter at the present time.

The parties respectfully request that the Court stay and hold in abeyance the deadline to

¹ While Defendant-Intervenors may join in Defendants' discovery requests as necessary to obtain discovered material, the parties agree that Defendant-Intervenors will neither propound additional discovery requests nor be subject to discovery in connection with the parties' reciprocal discovery process.

answer or otherwise respond to the Amended Complaint for both Defendants and Defendant-Intervenors, currently, September 6, 2022, while the parties are actively engaged in their reciprocal jurisdictional discovery process. While the deadline is held in abeyance, the parties propose that they file a Joint Status Report on the 15th day of each month outlining their progress and anticipated timeline. The parties will file the first such Report on or by September 15, 2022.

Dated: August 17, 2022

Respectfully submitted,

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Certificate of Service

On August 17, 2022, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

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